

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN**

CROWN BAY MARINA, L.P.,	)	
Plaintiff,	)	Civil No. 2018-68
vs.	)	
SUBBASE DRYDOCK, INC., et al.	)	
Defendants	)	
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CROWN BAY MARINA, L.P.,	)	
Plaintiff,	)	Civil No. 2018-73
vs.	)	
REEF TRANSPORTATION, LLC, et al.	)	
Defendants.	)	

## MOTION TO CHANGE TRIAL DATE

**COMES NOW** plaintiff, CROWN BAY MARINA, L.P., by and through undersigned counsel, and hereby moves the Court to change the trial date currently scheduled to begin on September 14, 2020, to a date after September 25, 2020, as one of plaintiff's experts will be unavailable due to pre-existing travel arrangements, and as such, will not be able to appear to provide critical testimony in this matter; and in support thereof states as follows:

1. Plaintiff's engineering expert, Paul Ferreras, has just advised the undersigned that he has pre-existing travel arrangements and plans to be out of the country from September 10, 2020 to September 25, 2020 on a long delayed trip with his family.

2. As such, Mr. Ferreras will not be available to testify on September 14 or 15, 2020. Mr. Ferreras' testimony is critical to both as to plaintiff's case in chief and as a rebuttal witness to rebut defendant's experts. As such, his physical presence during the trial is required to assist plaintiff's counsel. Plaintiff therefore respectfully requests that the Court reschedule the trial in this matter from September 14, 2020 to a date after September 25, 2020.

3. Plaintiff makes this request in good faith and not for purposes of delay. It is submitted that the foregoing establishes good cause for the rescheduling of the trial in this matter. It is further submitted that rescheduling the trial in this matter will not cause prejudice to defendants.

*Crown Bay Marina, LP v. Reef Transport LLC, et al.,*  
*Crown Bay Marina, LP v. Sub Base Dry Dock, Inc., et al.*  
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**WHEREFORE**, plaintiff respectfully requests that the Court reschedule the trial in this matter removing it from the September 14, 2020 trial calendar and resetting it for a date after September 25, 2020.

**DATED:** May 11, 2020

Respectfully submitted,  
**A.J. WEISS AND ASSOCIATES**

By: /s A. Jeffrey Weiss  
A. Jeffrey Weiss, Esq.  
6934 Vessup Lane  
St. Thomas, U.S. Virgin Islands 00802-1001  
Telephone: (340) 777-3011  
Telecopier: (340) 777-3019  
Email: [jeffweiss@weisslaw-vi.net](mailto:jeffweiss@weisslaw-vi.net)  
*Counsel for Plaintiff, Crown Bay Marina, L.P.*  
Dist.Ct. Case No. 3:18-cv-73

**CERTIFICATE OF SERVICE**

It is hereby certified that on this the 11<sup>th</sup> day of May 2020, I caused a true and exact copy of the foregoing **MOTION TO CHANGE TRIAL DATE** to be served on counsel using the CM/ECF system which will send a notification of such filing (NEF) to:

Gregory H. Hodges, Esq.  
**Dudley Newman Feuerzeig LLP**  
1336 Beltjen Rd., Suite 101  
St. Thomas, USVI 00802  
Email: [ghodges@dnfvi.com](mailto:ghodges@dnfvi.com)

with a copy to:

Andrew C. Simpson, Esq.  
**Law Offices of Andrew Simpson**  
2191 Church Street, Suite 5  
Christiansted, St. Croix,  
U.S. Virgin Islands 00820  
Email: [asimpson@coralbrief.com](mailto:asimpson@coralbrief.com)

David Cattie, Esq.  
**The Cattie Law Firm, P.C.**  
1710 Kongens Gade  
St. Thomas, U.S. Virgin Islands 00802  
Email: [david.cattie@cattie-law.com](mailto:david.cattie@cattie-law.com)

*Crown Bay Marina, LP v. Reef Transport LLC, et al.,*  
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and a courtesy copy to:

Carol G. Hurst, Esq.  
P.O. Box 10829  
5143 Palm Passage, Suite 18-B-1  
St. Thomas, U.S. Virgin Islands 00802  
Email: [cghurst@hurstvilaw.com](mailto:cghurst@hurstvilaw.com)  
*Counsel for Ella Blue, Inc.*  
Dist. Ct. Case No. 3:19-cv-95

/s/ A. Jeffrey Weiss  
A. Jeffrey Weiss, Esq.